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11	Telephone: (612) 341-0400  Attorneys for Plaintiff					
13	UNITED STATES DISTRICT COURT					
14	NORTHERN DISTRICT OF CALIFORNIA					
15	SAN FRANCISCO DIVISION					
16	JOSHUA KELLER, on behalf of himself an	d Case No. 22-cv-06986-JD				
17 18	all others similarly situated,  Plaintiff,	STIPULATION AND [PROPOSED] ORDER REGARDING DISMISSAL WITH PREJUDICE PURSUANT TO FEDERAL RULE OF CIVIL				
19	V.	PROCEDURE 41(A)(1)(A)(II)				
20	CHEGG, INC.,	Judge: James Donato				
21	Defendant.					
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28		STIPULATION & [PROPOSED] ORDER OF				

STIPULATION & [PROPOSED] ORDER OF DISMISSAL WITH PREJUDICE 22-CV-06986-JD

1 **STIPULATION** 2 Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Joshua Keller 3 ("Plaintiff") and Defendant Chegg, Inc. ("Defendant" or "Chegg") hereby stipulate that the above-4 captioned action be dismissed with prejudice as to all parties, claims, and causes of action. Each 5 party will bear its own attorney's fees and costs. 6 Dated: March 25, 2024 REESE LLP 7 8 By:/s/ Michael R. Reese 9 Michael R. Reese (206773) 10 100 West 93rd Street, 16th Floor New York, New York 10025 11 Telephone: (212) 643-0500 12 mreese@reesellp.com 13 George V. Granade (316050) ggranade@reesellp.com 14 8484 Wilshire Boulevard, Suite 515 Los Angeles, California 90211 15 Telephone: (310) 393-0070 16 Charles D. Moore (admitted *pro hac vice*) cmoore@reesellp.com 17 100 South 5th Street, Suite 1900 18 Minneapolis, Minnesota 55402 Telephone: (212) 643-0500 19 ZIMMERMAN REED LLP 20 Caleb Marker caleb.marker@zimmreed.com 21 6420 Wilshire Blvd., Suite 1080 Los Angeles, California 90048 22 Telephone: (877) 500-8780 23 LAUKAITIS LAW FIRM LLC 24 Kevin Laukaitis (to be admitted pro hac vice) 737 Bainbridge Street, #155 25 Philadelphia, Pennsylvania 19147 Phone: (215) 789-4462 26 klaukaitis@laukaitislaw.com 27 Attorneys for Plaintiff 28

	Case 3:22-cv-06986-JD	Document 40	Filed 03/25/24	Page 3 of 4
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2	Dated: March 25, 2024		COOLEY LLP	
3				
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COOLEY LLP ATTORNEYS AT LAW SAN FRANCISCO

1	[PROPOSED] ORDER					
2	Pursuant to the stipulation of the parties under Federal Rule of Civil Procedure 41(a)(1)(ii),					
3	IT IS ORDERED THAT THIS ACTION BE, AND HEREBY IS, DISMISSED WITH					
4	PREJUDICE as to all claims, causes of action, and parties, with each party bearing that party's own					
5	attorney's fees and costs. The Clerk is directed to close the file.					
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7	Dated: Honorable James Donato					
8	United States District Judge					
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